## **REMARKS**

In response to the Office Action dated October 3, 2005, Applicant respectfully requests reconsideration and withdrawal of the rejection of claims 2, 6, 8 and 9. The allowance of claims 1, 3-5 and 7 is noted with appreciation.

Claims 2, 6, 8 and 9 were rejected under 35 U.S.C. § 102, on the grounds that they were considered to be anticipated by the newly-cited Francis et al patent (US 6,362,893). As set forth in MPEP § 2131, "to anticipate a claim, the reference must teach every element of the claim." For the reasons presented below, it is respectfully submitted that the Francis patent does not teach every element of the rejected claims, and therefore does not meet the standard for anticipation of those claims.

Claim 2 recites an output system having a data processing device, an output device and driver software. The claim further recites a first data modifier provided on the data processing device that modifies data processed by the driver software, and a second data modifier provided on the output device that performs complementary modification on received data. In rejecting the claim, the Office Action states that the Francis patent discloses first and second data modifiers, of the types claimed, at column 6, lines 5-41. However, Applicant is unable to identify any support in the cited passage for this statement.

The Francis patent is concerned with maintaining the security of a printer, particularly one that is used to print identification cards. The basic concept disclosed in the patent is that a smart card is associated with the printer whose security is to be protected. To this end, a password is stored on the card, and the password is also stored in the memory of the printer with which the card is associated. In order to use

the printer, a smart card with the proper password must be present in a slot on the printer. If it is not, printing is inhibited. See column 4, line 62, to column 5, line 4.

The cited passage at column 6, lines 5-41, describes the procedure by which a password is downloaded onto the smart card. It does not discuss the *data* that is processed by a computer or similar such data processing device and sent to the printer, such as the user data to be printed on an identification card. More specifically, it does not disclose that such data is *modified* by a first data modifier on the data processing device, and then modified in a *complementary* manner by a second data modifier on the protected printer.

If the rejection is not withdrawn, the examiner is respectfully requested to explain what subject matter disclosed in the Francis patent is considered to be a first data modifier on the data processing device, and what constitutes a second, complementary data modifier on the printer. In the absence of such an explanation, it is respectfully submitted that there is no showing that the Francis patent teaches every element of claim 2, and hence the rejection cannot be maintained.

For analogous reasons, it is respectfully submitted that claims 6 and 8 are likewise not anticipated by the Francis patent.

Claim 9 recites a computer-readable storage medium containing a program that includes the step of encrypting output data from an application program run on a data processing device, in which a specific password is set for output data from the application program. In rejecting this claim, the Office Action refers to the Francis patent at column 4, lines 21-49, and column 6, lines 5-41. As discussed previously, the cited passage at column 6, lines 5-41, pertains to the procedure for downloading a password onto a smart card. However, it does not disclose the *encryption* of data

Attorney's Docket No. <u>018775-813</u> Application No. <u>09/753,601</u>

Page 8

from an application program. Nor does it disclose setting a password for such data.

The downloading of a password on the smart card is distinct from any particular data

that is output by an application program, e.g. user identification data.

Likewise, the passage at column 4, lines 21-49, does not disclose the encryption of data from an application program. Nor does it discuss a password in the context of such data.

For at least these, reasons, therefore, the Francis patent does not anticipate the subject matter of claim 9.

In view of the foregoing, it is submitted that all pending claims are allowable over the prior art of record, and a notice to that effect is respectfully solicited.

Respectfully submitted,

**BUCHANAN INGERSOLL PC** 

Date: February 6, 2006

James A. LaBarre

Registration No. 28,632

P.O. Box 1404 Alexandria, Virginia 22313-1404 (703) 836-6620